

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
THOR GOLD,

Plaintiff,

-against-

CHARLES LESLIE

Defendant.
-----X

SUMMONS

Jury Trial Demanded

Plaintiff designates New York
County as the place of trial.

The basis of venue is:
CPLR § 503

To the above-named Defendant:

You are hereby summoned to answer the Complaint in this action, and to serve a copy of your answer, or, if the Complaint is not served with this Summons, to serve a notice of appearance on the Plaintiffs' attorney within 20 days after the service of this Summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: NEW YORK, NEW YORK
September 17, 2019

COHEN & FITCH LLP
Attorneys for Plaintiff
225 Broadway, Suite 2700
New York, N.Y. 10007
(212) 374-9115

TO: CHARLES LESLIE
131 Prince Street, Apt. 4R
New York, New York, 10012

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
THOR GOLD,

Plaintiffs,

-against-

CHARLES LESLIE,

Defendants.
-----X

VERIFIED COMPLAINT

JURY TRIAL DEMANDED

BASIS FOR VENUE:

CPLR § 503

THOR GOLD ("Plaintiff") by his attorneys, COHEN & FITCH, LLP and the LAW OFFICES OF JEFFREY SCHONBRUN, P.C., complaining of CHARLES LESLIE, ("Defendant"), allege upon knowledge as to their own actions, and upon information and belief as to all other matters, as follows:

NATURE OF CASE/ PRELIMINARY STATEMENT

1. This is an action to recover damages arising from Charles Leslie's ("Leslie" or "Defendant") sexual molestation of Plaintiff, Thor Gold, ("Gold" or "Plaintiff") at Leslie's home at 131 Prince Street, Apt. 4R, New York, New York, 10012 when Gold was approximately eight years old.
2. Leslie was a friend of Mr. Gold's mother, Alison Gold, and used his position as a "family friend" to act as father/uncle type figure to groom and ultimately molest Gold in the 1970's.
3. Leslie engaged in explicit sexual behavior and lewd and lascivious conduct with Gold, when he was just a young boy and still innocent about his sexuality.
4. Gold now seeks damages from Defendant Leslie for his reprehensible conduct and actions that have tormented him emotionally for decades.

JURISDICTION AND VENUE

5. This court has jurisdiction over this action pursuant to CPLR §§301 and 302, and venue is proper pursuant to CPLR § 503.

JURY DEMAND

6. Plaintiff respectfully demands a trial by jury on each count of this Complaint.

PARTIES

7. Plaintiff Thor Gold resides in the County of Los Angeles, State of California.

8. Upon information and belief, Defendant, Charles Leslie, still resides at the location where Gold was molested, at 131 Prince Street, in the City and State of New York.

FACTUAL ALLEGATIONS

9. Plaintiff Thor Gold was born in 1966 in New York City.

10. When he was approximately six (6) months old, Plaintiff's parents divorced.

11. As a result, Plaintiff had no further relationship with his father and spent much of his early childhood with his mother living transiently in different cities and towns around the world.

12. During that time period, Plaintiff's mother suffered from alcoholism and was regularly intoxicated around Plaintiff.

13. In the Spring of 1973, when Plaintiff was approximately seven (7) years old, he and his mother moved back to New York City to an apartment on 57th Street.

14. In New York, plaintiff's mother continued to suffer from alcoholism.

15. His mother's alcoholism together with their frequent moving about were a constant source of instability for Plaintiff and made him particularly susceptible to abuse from a child predator such as Defendant.

Meeting Charles Leslie

16. Shortly after moving back to New York City, Plaintiff's mother started to regularly socialize with a gentleman by the name of J. Frederic "Fritz" Lohman ("Lohman") who lived in an apartment located at 131 Prince Street, New York, New York with his partner, Defendant, Charles Leslie.

17. As a result, on weekends, Plaintiff's mother would often bring Plaintiff with her to Lohman and Defendant's home for meals and social gatherings.

Charles Leslie Began Grooming the Plaintiff for Molestation

18. Almost immediately upon meeting Defendant, Plaintiff was struck by the particular interest Defendant began to show in Plaintiff, especially since most of the other adults present ignored him at that time.

19. Given Plaintiff's background, and the lack of a father figure in his life, Plaintiff welcomed Defendant's attention and even gravitated towards Defendant, who was always happy and willing to speak to and spend time with Plaintiff.

20. During this time period, Plaintiff spent a considerable amount of time with Defendant and their relationship grew.

21. Defendant would frequently take Plaintiff to events like the circus and baseball games, and even invited Plaintiff to help work preparing a restaurant Defendant was opening up in New York City.

22. Defendant also attended Plaintiff's school graduation.

23. As a result of this grooming, Plaintiff came to trust Defendant, and at times even turned to Defendant for help and comfort through periods of his mother's absence; and in fact, on one evening when Plaintiff's mother had left him home alone, Plaintiff called Defendant, who immediately came to pick him up and bring him back to his home.

24. As a young boy – approximately eight (8) years old – Plaintiff never suspected that Defendant’s attention and “kindness” was only in furtherance of Defendant’s desire to engage in sexual acts with him.

25. Defendant’s true intentions only became apparent to Plaintiff years later when he recalled the many conversations he and Defendant had about how it was “natural” and “good” for a little boy to have and express his sexuality.

Defendant’s Sexual Molestation of Plaintiff

26. One day during this same time period when Plaintiff was inside of Defendant’s apartment alone with him, Plaintiff began asking Defendant about male genitalia.

27. Plaintiff’s curiosity was likely prompted by the numerous sexual images displayed prominently throughout Defendant’s home, which included many pictures of male genitals, pornography, and even a bronze key chain molded to the shape of a penis and testicles that Defendant regularly carried outside of one of his pockets.

28. Plaintiff remembers asking Defendant, who was the only adult male figure in his life, about how his body worked – specifically, about erect penises.

29. Rather than explain this to him in terms a young boy could understand, or tell Plaintiff that he was not the right person to discuss this topic with him, Defendant used this conversation as an opening to sexually abuse Plaintiff.

30. Specifically, Defendant asked Plaintiff if he wanted to see how a penis gets erect.

31. Defendant then escorted Plaintiff to the bathroom located adjacent to his bedroom.

32. While in the bathroom, Defendant disrobed to a point that Plaintiff had never seen; Defendant’s chest was bare and he had on a jockstrap or underwear that looked like a jockstrap.

33. Defendant then placed Plaintiff in the bathtub and sat at the lip of the tub facing Plaintiff.

34. Defendant then fully exposed his penis and put it in Plaintiff's mouth in an attempt to force Plaintiff to perform oral sex on him.

35. Thereafter, Defendant showed Plaintiff pornographic images of a woman performing oral sex on a man in an effort to normalize the sexual act Defendant had Plaintiff perform on him.

36. As a young boy, Plaintiff was completely bewildered and confused by this incident and really did not know how to process the sex act.

37. Plaintiff did not discuss this event with anyone contemporaneously, because the only person he had trusted up until that time was his abuser, the Defendant.

38. While Plaintiff's mother ultimately went to rehab in 1975, and successfully completed the program, at the time of this incident she was still drinking heavily.

39. In fact, around the time of this incident, Plaintiff had to move in with his grandparents and live with them until he was approximately eleven (11) years old.

40. As a result, Plaintiff did not discuss this incident with anyone until his mid-twenties when he finally sought therapy after years of internal emotional and psychological torment.

Plaintiff Suffers from Extreme Emotional Distress As a Result of the Molestation

41. Defendant's aberrant conduct has had a profound impact on Plaintiff's life.

42. While Plaintiff knew there was something wrong with what Defendant had done to him, he did not know what it meant and could not understand why he felt it was wrong.

43. Plaintiff was emotionally and psychologically tortured by the betrayal of trust by Defendant for many years.

44. Plaintiff questioned his sexuality and at different times felt that he was completely asexual.

45. Plaintiff could not establish meaningful relationships and had tremendous psychological damage stemming from this trauma that still haunts him today.

46. Plaintiff has been in and out of therapy for most of his adult life, largely arising from this event.

Plaintiff Confronts Leslie About the Incident

47. After years of therapy and soul searching, Plaintiff decided to confront Defendant about the aforementioned sexual abuse.

48. Specifically, Plaintiff sent Defendant a letter accusing him of this conduct.

49. Plaintiff's mother also sent Defendant a letter making the same accusation.

50. These letters were composed and sent at a time when the statute of limitations made taking any action against Defendant impossible and prior to the passage of the Child Victims Act which has now given Plaintiff a chance to redress these acts of abuse in the instant litigation.

51. Leslie did not respond to either letter and did not take any steps to dispute these allegations.

CAUSES OF ACTION

FIRST CAUSE OF ACTION: BATTERY

52. Plaintiff repeats and realleges by reference all preceding paragraphs of this Complaint into this paragraph.

53. On or about and between 1973 and 1975 while inside Leslie's apartment, Leslie intentionally touched Plaintiff's body when he engaged in the sexual behavior and lewd and lascivious conduct described above. Such bodily contact was offensive and was without consent,

because Plaintiff, as a minor, was incapable of consenting to these acts.

54. Plaintiff suffered injury as a result of Leslie's offensive bodily contact, including psychological and emotional injury as described above.

55. By the reason of the foregoing, Defendant is liable to Plaintiff for battery in an amount to be proved at trial, but no less than \$10,000,000.

SECOND CAUSE OF ACTION: ASSAULT

56. Plaintiff repeats and realleges by reference all preceding paragraphs of this Complaint into this paragraph.

57. On or about and between 1973 and 1975 while inside Leslie's apartment, Leslie intentionally touched Plaintiff's body when he engaged in the sexual behavior and lewd and lascivious conduct described above. Such conduct placed Plaintiff in imminent apprehension of harmful contact, including apprehension of further sexual contact.

58. Plaintiff suffered injury as a result of Leslie's conduct, including psychological and emotional injury as described above.

59. By the reason of the foregoing, Defendant is liable to Plaintiff for assault in an amount to be proved at trial, but no less than \$10,000,000.

**THIRD CAUSE OF ACTION:
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

60. Plaintiff repeats and realleges by reference all preceding paragraphs of this Complaint into this paragraph.

61. The sexual abuse of Gold when Plaintiff was a minor was extreme and outrageous conduct, beyond all possible bounds of decency, atrocious and intolerable in a civilized community.

62. Defendant knew or disregarded the substantial probability that his conduct would

cause severe emotional distress to Plaintiff.

63. Plaintiff suffered severe emotional distress including psychological and emotional injury as described above. This distress was caused by Leslie's sexual abuse of Plaintiff.

64. By the reason of the foregoing, the defendant is liable to Plaintiff for intentional infliction of emotional distress in an amount to be proved at trial, but no less than \$10,000,000.

WHEREFORE, Plaintiffs pray for judgment as follows:

- A. Awarding compensatory damages in an amount sufficient to compensate Plaintiff for his injuries;
- B. Awarding Plaintiff costs and disbursements and attorneys' fees to the extent available by law; and
- C. Awarding such other and further relief as this Court may deem just and proper.

Dated: New York, New York
September 17, 2019

Respectfully submitted,

/s/

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LAW OFFICE OF JEFFREY SCHONBRUN

ATTORNEY'S VERIFICATION

GERALD M. COHEN, an attorney duly admitted to practice law in the Courts of the State of New York, shows:

That he is a member of the law firm of COHEN & FITCH, LLP the attorneys for plaintiff THOR GOLD in the within entitled action.

That your deponent has read the foregoing **VERIFIED COMPLAINT** and knows the contents thereof, and that the same is true to his own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters, he believes it to be true.

That the source of the deponent's information are investigation and records in the file.

That the reason why the verification is made by deponent and not by the plaintiff is that the plaintiff is not currently residing within the county wherein deponent maintains his office.

Deponent affirms that the foregoing statements are true under the penalties of perjury.

Dated: New York, New York
September 17, 2019

/S
GERALD M. COHEN